

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

LUKE T. CHRISMAN,

Plaintiff,

v.

LLOYD J. AUSTIN, III,
United States Secretary of Defense, *et al.*,

Defendants.

No. 6:22-cv-0049-H

**DEFENDANTS' FIRST SET OF
INTERROGATORIES TO PLAINTIFFS**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendants, by and through their undersigned counsel, hereby respectfully submit their first set of interrogatories.

INSTRUCTIONS

For purposes of these interrogatories, the following definitions apply:

1. When asked to answer an interrogatory, the request is for information within your actual or constructive possession, custody or control. Your answers must include not only information available to you, but also information that is available to your attorneys, associates, employees, representatives, agents, and all other persons acting under, by, or through you, or subject to your control or supervision, or acting on your behalf.
2. If you cannot fully and completely answer an interrogatory, please answer as much as you are able to, and provide the facts you rely upon in support of your contention that you cannot answer fully. To the extent an interrogatory is not answered because of an assertion of privilege, please state the specific privilege relied upon and support the claim of privilege with a statement of particulars sufficient to enable the Court to assess its validity consistent with Federal Rule of Civil Procedure 26. If you object to answering only part of an interrogatory, please answer that part you do not object to answering and indicate what portion of the interrogatory to which your assertion of privilege extends.
3. These questions do not seek information the revelation of which would violate the attorney-client privilege. Please do not include any personally identifiable information of Plaintiffs.
4. If, in response to one or more of the interrogatories, you produce or identify any document(s) pursuant to Federal Rule of Civil Procedure 33(d), please identify the document(s) with specificity (for example, by BATES label).

5. Please submit the answers to undersigned counsel at the email address below no later than thirty (30) days from date of service.

DEFINITIONS

For purposes of these interrogatories, the following definitions apply:

1. **“Firms”** includes any and all law firms retained to represent Plaintiffs in this lawsuit, including Siri & Glimstad LLP, Christ Wiest Law PLLC, Bruns, Connell, Vollmar & Armstrong LLC, and S&L Law PLLC.

2. **“Plaintiffs”** shall mean Robert Schelske, Huntley W. Bakich, Zakai Bukfin, Samuel L. Conklin, Joshua J. Costroff, Samuel Galloway, Dominic O. Mell, Collin M. Morrison, Nicholas Saballa, Peter Testa, and Luke T. Chrisman.

3. **“Case citation”** shall mean the citation of the case as specified by the most recent edition of the Bluebook, including the case name and case number.

4. **“Litigation matter”** shall mean any case brought before a court, board, commission, or tribunal in any federal, state, or international jurisdiction, including but not limited to any military board of corrections or any court, board, commission, or tribunal governed by the Uniform Code of Military Justice.

5. **“Attorney”** shall mean any individual who is employed in the practice of law and is licensed to practice law in any state, and who submitted a request for fees in the above-captioned case.

6. **“Time”** shall mean any amount of hours or increments of hours spent working on a litigation matter.

7. **“Recompense”** shall mean any monetary charges arising out of an Attorney’s representation of a client in a litigation matter.

8. **“Billing rate”** shall mean the hourly rate that an Attorney charged to a client if billed by the hour; or the flat rate that an Attorney charged to a client if billed by a flat fee; or the alternative rate that an Attorney charged to a client if billed by an alternative rate.

9. **“And”** and **“or”** shall be construed conjunctively and disjunctively.

10. **“Each”** means each and every.

11. The singular form of any word shall also be construed as the plural, and vice versa. Verbs shall be construed as though they were in the past tense, the present and the future tense, and vice versa. In general, the interrogatories should be construed as broadly as possible.

INTERROGATORIES

INTERROGATORY NO. 1:

For each litigation matter handled on a non-pro bono basis, by any Attorney whose time forms the basis of the request for attorney's fees in the above captioned litigation, please provide the case citation of any litigation matter on which the Attorney spent time since January 1, 2019, and sought recompense, the billing rate charged by the Attorney for that litigation, the total amount charged by the Attorney for that litigation, and the total amount collected by the Attorney for that litigation.

Dated: January 26, 2024

Respectfully submitted,

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